

# COMPLAINT

(for non-prisoner filers without lawyers)

## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF WISCONSIN

CLERK USDC EDWI  
FILED

2024 OCT 10 P 1:11

(Full name of plaintiff(s))

NICHOLAS SCOTT WERLING p/k/a Lil sippy

v.

Case Number:

24-CV-1291

(Full name of defendant(s))

(to be supplied by Clerk of Court)

UNITED STATES SECRET SERVICE

AGENT BOSWELL, SPECIAL AGENT

ANDREW DEAN, ALEX KAUFMAN

→ United States Secret Service,  
Dodge County, WI, Agent  
Boswell, Special Agent Jermaine  
Johnson, Andrew Dean, Alex  
Kaufman, Ryan Schwartz, John  
Doe #1, John Doe #2, and Jane Doe #1.

### A. PARTIES

1. Plaintiff is a citizen of WISCONSIN and resides at  
(State)

P.O. BOX 803, SUN PRAIRIE, WI 53590

(Address)

(If more than one plaintiff is filing, use another piece of paper.)

2. Defendant UNITED STATES SECRET SERVICE

(Name)

is (if a person or private corporation) a citizen of N/A  
(State, if known)  
and (if a person) resides at N/A  
(Address, if known)  
and (if the defendant harmed you while doing the defendant's job)  
worked for N/A  
(Employer's name and address, if known)

(If you need to list more defendants, use another piece of paper.)

B. STATEMENT OF CLAIM

On the space provided on the following pages, tell:

1. Who violated your rights;
2. What each defendant did;
3. When they did it;
4. Where it happened; and
5. Why they did it, if you know.

ON OCTOBER 6, 2024 PLAINTIFF WAS PLANNING ON ATTENDING A RALLY THAT  
DONALD TRUMP WOULD BE SPEAKING AT AT THE DODGE COUTY AIRPORT IN  
JUNEAU, WI. WHILE PLAINTIFF WAS DRIVING UP TO THE RALLY A DODGE  
COUNTY SHERIFF'S DEPUTY STARTED FOLLOWING HIM AROUND THE BEAVER  
DAM AREA AND CONTINUED TO FOLLOW PLAINTIFF INTO JUNEAU. ONCE  
PLAINTIFF GOT TO THE INTERSECTION OF NORTH MAIN STREET AND COUNTY  
ROAD DF PLAINTIFF SAW THAT NORTH MAIN STREET WAS BLOCKED AND THEN  
LAW ENFORCEMENT APPROACHED PLAINTIFF AND TOLD HIM TO PULL OVER  
SO PLAINTIFF PULLED IN TO THE WESTERNMOST PARKING LOT OF THE DODGE  
COUNTY HUMAN SERVICES BUILDING (APPROXIMATELY 43.4161156,

## PAGE 2A - LIST OF DEFENDANTS

1. **UNITED STATES SECRET SERVICE**
2. **DODGE COUNTY, WI**
3. **AGENT BOSWELL IS A CITIZEN OF A STATE THAT IS NOT WISCONSIN AND AT ALL TIMES RELEVANT TO THE COMPLAINT WORKED FOR UNITED STATES SECRET SERVICE. PLAINTIFF DOES NOT KNOW SPECIFICALLY WHAT STATE SHE IS A CITIZEN OF.**
4. **SPECIAL AGENT JERMAINE JOHNSON, AT ALL TIMES RELEVANT TO THE COMPLAINT, WAS EMPLOYED BY THE UNITED STATES SECRET SERVICE. PLAINTIFF DOES NOT KNOW WHAT STATE HE IS A CITIZEN OF.**
5. **ANDREW DEAN, AT ALL TIMES RELEVANT TO THIS COMPLAINT, WORKED AS A DEPUTY FOR THE DODGE COUNTY SHERIFF'S OFFICE WITH BADGE NUMBER 226. PLAINTIFF ASSUMES HE IS A RESIDENT OF THE STATE OF WISCONSIN.**
6. **ALEX KAUFMAN, AT ALL TIMES RELEVANT TO THE COMPLAINT, WORKED AS A "DEPUTY IN TRAINING" FOR THE DODGE COUNTY SHERIFF'S OFFICE. PLAINTIFF ASSUMES HE IS A RESIDENT OF THE STATE OF WISCONSIN.**
7. **RYAN SCHWARTZ, AT ALL TIMES RELEVANT TO THE COMPLAINT, WORKED AS A DEPUTY FOR THE DODGE COUNTY SHERIFF'S OFFICE. PLAINTIFF ASSUMES HE IS A RESIDENT OF THE STATE OF WISCONSIN.**
8. **JOHN DOE #1, AT ALL TIMES RELEVANT TO THE COMPLAINT, WORKED FOR THE UNITED STATES SECRET SERVICE. PLAINTIFF DOES NOT KNOW WHAT STATE HE IS A RESIDENT OF.**
9. **JOHN DOE #2, AT ALL TIMES RELEVANT TO THE COMPLAINT, WAS EMPLOYED BY SOME SORT OF LAW ENFORCEMENT AGENCY (PROBABLY THE UNITED STATES SECRET SERVICE). PLAINTIFF DOES NOT KNOW WHAT STATE HE IS A RESIDENT OF.**
10. **JANE DOE #1, AT ALL TIMES RELEVANT TO THE COMPLAINT, WAS EMPLOYED BY SOME SORT OF LAW ENFORCEMENT AGENCY (PROBABLY A COUNTY SHERIFF'S DEPARTMENT BASED UPON THE WAY SHE WAS DRESSED). PLAINTIFF ASSUMES SHE IS A CITIZEN OF THE STATE OF WISCONSIN.**

-88.6987702). DEFENDANT DEAN THEN TOLD PLAINTIFF THAT HE IS ON THE FBI'S DOMESTIC TERRORISM WATCHLIST AND TOOK HIS CAR KEYS AWAY FROM HIM. DEAN SAID THAT THE SECRET SERVICE WANTED TO SPEAK WITH PLAINTIFF. DEFENDANTS BOSWELL AND JOHN DOE #1 BRIEFLY SPOKE WITH PLAINTIFF AND LIED TO PLAINTIFF, SAYING ONLY PEOPLE WHO HAVE BEEN FORMALLY INVITED BY THE REPUBLICAN PARTY CAN ATTEND TRUMP'S RALLIES. BOSWELL AND JOHN DOE #1 LEFT BRIEFLY. THEN BOSWELL RETURNED WITH DEFENDANT JOHNSON AND PROCEEDED TO ASK PLAINTIFF MANY QUESTIONS. THEN THEY LEFT, THIS TIME FOR MUCH LONGER. AT APPROXIMATELY 8:38 A.M. PLAINTIFF ASKED DEFENDANTS DEAN AND SCHWARTZ TO GIVE HIM HIS CAR KEYS. THEY REFUSED TO DO SO. PLAINTIFF ASKED IF HE WAS BEING DETAINED. DEAN AND SCHWARTZ CONFIRMED THAT, YES, PLAINTIFF WAS BEING DETAINED BY ORDER OF SECRET SERVICE. PLAINTIFF ASKED WHAT STATUTE OR CASE LAW GAVE THEM AUTHORITY TO DETAIN HIM AND DEAN AND SCHWARTZ TOLD PLAINTIFF TO TAKE IT UP WITH SECRET SERVICE. PLAINTIFF THEN STEPPED OUT OF THE CAR TO SPEAK WITH SECRET SERVICE BUT THEN DEAN BECAME AGGRESSIVE AND DEMANDED THAT PLAINTIFF GET BACK IN HIS CAR. DOE #1 WAS PRETTY FAR AWAY SO DEFENDANT YELLED FOR HIM TO COME OVER AND TALK TO HIM, BUT DOE #1 IGNORED PLAINTIFF. DURING THIS WHOLE ORDEAL DEFENDANT... (CONTINUED ON PAGE 3A)

PAGE 3A - COMPLAINT (CONTINUED)

(CONTINUED FROM PAGE 3) ...KAUFMAN WAS STANDING NEXT TO DEFENDANT'S CAR, ALONG WITH DEAN AND SCHWARTZ, IN AN INTIMIDATING MANNER TO PREVENT PLAINTIFF FROM LEAVING. EVENTUALLY DEFENDANT JANE DOE #1 ARRIVED ON SCENE AND BROUGHT AN EXPLOSIVE-SNIFFING DOG AND HAD THE DOG SNIFF PLAINTIFF'S CAR. THIS WAS OBVIOUSLY UNLAWFUL PURSUANT TO *RODRIGUEZ V. UNITED STATES*, 575 U.S. 348, 135 S.C.T. 1609 (2015). WHILE THE EXPLOSIVE-SNIFFING DOG WAS SMELLING PLAINTIFF'S VEHICLE, DEFENDANT JOHN DOE #2 GOT ON THE GROUND AND WAS LOOKING UNDER THE CAR. SHORTLY AFTER THE DOG GOT DONE SNIFFING PLAINTIFF'S CAR, DEFENDANT DEAN TOLD PLAINTIFF THAT HE WAS NO LONGER BEING DETAINED AND THAT HE WAS NOW FREE TO GO. DURING THIS ENTIRE ORDEAL, NONE OF THE LAW ENFORCEMENT OFFICIALS INVOLVED HAD ANY REASONABLE SUSPICION, AND CERTAINLY NOT ANY PROBABLE CAUSE EITHER, TO BELIEVE PLAINTIFF HAD COMMITTED A CRIME.

NOW TO GIVE A TIMELINE: PLAINTIFF WAS INITIALLY PULLED OVER, UNLAWFULLY DETAINED, AND HAD HIS KEYS STOLEN FROM HIM BY DEFENDANT DEAN AT OR ABOUT 7:21 A.M. C.D.T. AND PLAINTIFF WAS FINALLY ALLOWED TO LEAVE AT OR AROUND 9:28 A.M. C.D.T. THUS, PLAINTIFF WAS UNLAWFULLY DETAINED FOR OVER TWO HOURS, WITH ABSOLUTELY NO REASONABLE SUSPICION THAT HE HAD COMMITTED A CRIME.

PLAINTIFF INVOKES THIS COURT'S JURISDICTION FOR ALL OF HIS CLAIMS PURSUANT TO 28 U.S.C. § 1331. PLAINTIFF INVOKES THIS COURT'S JURISDICTION FOR HIS CLAIMS AGAINST DEFENDANTS DODGE COUNTY, WI, DEAN, KAUFMAN, SCHWARTZ, AND JANE DOE #1 PURSUANT TO 42 U.S.C. § 1983. PLAINTIFF INVOKES THIS COURT'S JURISDICTION FOR HIS CLAIMS AGAINST DEFENDANTS UNITED STATES SECRET SERVICE, AGENT BOSWELL, SPECIAL AGENT JERMAINE JOHNSON, JOHN DOE #1, AND JOHN DOE #2 PURSUANT TO *BIVENS V. SIX UNKNOWN NAMED AGENTS OF FEDERAL BUREAU OF NARCOTICS*, 403 U.S. 388, 91 S.C.T. 1999 (1971). PLAINTIFF INVOKES THIS COURT'S JURISDICTION AGAINST DEFENDANTS UNITED STATES SECRET SERVICE AND DODGE COUNTY, WI PURSUANT TO *MONELL V. DEPARTMENT OF SOCIAL SERVICES OF THE CITY OF NEW YORK*, 436 U.S. 658, 98 S.C.T. 2018 (1978). PLAINTIFF SUES ALL DEFENDANTS IN BOTH THEIR OFFICIAL AND PERSONAL CAPACITIES.



C. JURISDICTION

☒ I am suing for a violation of federal law under 28 U.S.C. § 1331.

OR

☐ I am suing under state law. The state citizenship of the plaintiff(s) is (are) different from the state citizenship of every defendant, and the amount of money at stake in this case (not counting interest and costs) is \$ N/A.

D. RELIEF WANTED

Describe what you want the Court to do if you win your lawsuit. Examples may include an award of money or an order telling defendants to do something or to stop doing something.

A DECLARATORY JUDGMENT THAT DEFENDANTS UNITED STATES SECRET  
SERVICE, DODGE COUNTY, WI, AGENT BOSWELL, SPECIAL AGENT JERMAINE  
JOHNSON, ANDREW DEAN, ALEX KAUFMAN, RYAN SCHWARTZ, AND JOHN DOE  
#1 VIOLATED PLAINTIFF'S FEDERAL CONSTITUTIONAL RIGHTS BY UNLAWFULLY  
DETAINING PLAINTIFF FOR OVER TWO HOURS WITHOUT REASONABLE SUS-  
PICION TO BELIEVE THAT PLAINTIFF HAD COMMITTED A CRIME, AND THAT  
DEFENDANTS JANE DOE #1 AND JOHN DOE #2 VIOLATED DEFENDANT'S  
CONSTITUTIONAL RIGHTS TO BE FREE FROM UNREASONABLE SEARCHES AND  
SEIZURES. PLUS \$1,000,000.00 USD IN COMPENSATORY DAMAGES FROM EACH  
DEFENDANT AND \$5,000,000.00 USD IN PUNITIVE DAMAGES FROM EACH  
DEFENDANT FOR A CUMULATIVE TOTAL OF \$60,000,000.00 USD IN DAMAGES  
FROM ALL DEFENDANTS.

E. JURY DEMAND

I want a jury to hear my case.

☒ - YES

☐ - NO

I declare under penalty of perjury that the foregoing is true and correct.

Complaint signed this 6<sup>th</sup> day of october 2024.

Respectfully Submitted,

[Signature]

Signature of Plaintiff

608-234-3035

Plaintiff's Telephone Number

gothShooter\_trenchcoat@protonmail.ch

Plaintiff's Email Address

P.O. Box 803, Sun Prairie, WI 53590-0803  
USA

(Mailing Address of Plaintiff)

(If more than one plaintiff, use another piece of paper.)

**REQUEST TO PROCEED IN DISTRICT COURT WITHOUT PREPAYING THE FILING FEE**

☒ I **DO** request that I be allowed to file this complaint without paying the filing fee. I have completed a Request to Proceed in District Court without Prepaying the Filing Fee form and have attached it to the complaint.

☐ I **DO NOT** request that I be allowed to file this complaint without prepaying the filing fee under 28 U.S.C. § 1915, and I have included the full filing fee with this complaint.